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4 IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

5 JANICE LEE SMITH,

6 Plaintiff,

7
8 vs.

9 MILODRAGOVICH, DALE &
10 STEINBRENNER, P.C., a Montana
Professional Corporation; LON J. DALE,
11 and; MICHAEL BYBEE,

12 Defendants.

CASE NO. C18-997 RSM

JOINT STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
COMPLETION OF SERVICE OF
PROCESS AND FOR DEFENDANT
TO ANSWER

[LCR 7(d)(1) and LCR 10(g)]

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14 COME NOW JANICE LEE SMITH, Plaintiff herein, and MILODRAGOVICH,
15 DALE & STEINBRENNER, P.C., by and through their respective, undersigned counsel
16 of record, and stipulate and agree as follows:

- 17 1. Plaintiff filed the Complaint in this case on July 5, 2018.
- 18 2. Defendant Milodragovich, Dale & Steinbrenner, P.C. waived service
19 of process.
- 20 3. Plaintiff has not completed service of process on Defendants Lon J. Dale
21 and Michael Bybee, both of whom are principals and/or employees of Defendant
22 Milodragovich, Dale and Steinbrenner, P.C.

- 23 4. Pursuant to Fed. R. Civ. P. 4(m), the deadline for completing service of

1 process on Defendant Dale and Bybee is October 3, 2018.

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3 5. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(ii), the Answer of Defendant
4 Milodragovich, Dale & Steinbrenner, P.C. is due on or about October 1, 2018.

5 6. The Complaint in this case is related to the Chapter 11 bankruptcy of
6 Plaintiff Janice Smith, United States Bankruptcy Court for the Western District of
7 Washington, Case no. 17-10988-TWD.

8 7. Plaintiff and Defendant Milodragovich, Dale & Steinbrenner, P.C.
9 have scheduled mediation of this case and other related matters, to be conducted by
10 mediator Armand J. Kornfeld on November 2, 2018 in Seattle, Washington.
11 The docket of Ms. Smith's bankruptcy case no. 17-10988-TWD include a Stipulation
12 related to the parties' mediation [Dkt. 122] and Order Appointing Mediator [Dkt. 124].
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14 8. Based on these circumstances, Plaintiff Janice Smith and Defendant
15 Milodragovich, Dale & Steinbrenner, P.C. stipulate and agree to extend the deadline
16 for Plaintiff to complete service of process on the remaining defendant, Lon J. Dale and
17 Michael Bybee, through and including Monday, December 3, 2018, and further agree to
18 extend the due date for the Answer of Defendant Milodragovich, Dale & Steinbrenner,
19 P.C. to December 17, 2018.
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21 DATED: October 1, 2018.

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23 WAID LAW OFFICE, PLLC

24 BY: /s/ Brian J. Waid

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BRIAN J. WAID
WSBA No. 26038
Attorney for Plaintiff

SCHWABE, WILLIAMSON & WYATT

BY: /s/ Christopher H. Howard (email
authorization)
CHRISTOPHER H. HOWARD
WSBA No. 11074
Attorney for Defendant
Milodragovich, Dale &
Steinbrenner, P.C.

ORDER APPROVING STIPULATION

IT IS SO ORDERED this 4th day of October 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT
JUDGE